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processing said decoded datastream of data blocks to produce therefrom a first datastream comprising at least first and second groups of data block components having pixel representative information interleaved in a first predetermined sequence, and a second datastream comprising at least third and fourth groups of data block components having pixel representative information interleaved in a second predetermined sequence; and
decoding said first and second datastreams to produce decoded image information.

REMARKS

I. The Rejection

Claims 1 – 15, all claims in this application have been rejected a second time under 35 U.S.C. § 102 (e) as unpatentable over Park (US 5,675,424).

In the Final Rejection, the Examiner acknowledged that an error was made in the preceding Office Action in that “demultiplexer 13 of fig. 3a described by Park ‘424 does not derive multiple data-streams from a single data-stream” . In addition, the Examiner changed position in the rejection and now relies on fig. 3b and element 61 instead of fig. 3a and 13. The Examiner also relied on “the combination of (i.e. figs. 3a – 3b, units 13 and 61)” for a showing in Park of “the interleaving network as claimed”. Finally, the Examiner has “requested” clarification of a statement by Applicant in the previous response by asking “What features are the “significant elements of the present claims”?

In order to address these issues more directly, Applicant has elected to rearrange the claim language to overcome some of the confusion which arose from difficulties in understanding the inartfully translated English language appearing in the Park patent.

The relevant language of the involved section 102(e) is as follows:

“A person shall be entitled to a patent unless –

(e) the invention was described in –

(2) a patent granted on an application for patent by another filed in

the United States before the invention by the applicant for patent, except that a patent shall not be deemed filed in the United States for the purposes of this subsection based on the filing of an international application---“.

This section of the Patent Laws defines a very special type of prior art – an invention of another which ultimately results in the grant of a patent and is afforded the status of prior art NOT as of the date of grant of the patent or publication of the application, but as of the earlier date on which the application is filed in the United States. It is clear that, since the reference must first become a patent and then it becomes effective as a patent-defeating reference as of a date (the U. S. application filing date) when the entire application document was still secret, this unique transformation still leaves in place the requirement which exists throughout all subparts of Section 102 that “the (entire) invention” (that is, all elements) must be described in the cited reference. This principal has been described in CAFC decisions which are set forth in the MPEP as follows (regarding 102 “anticipation” rejections of claims).

Thus, in order to anticipate a claim, the reference must teach every element of the claim. That is,

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. V. Union Oil Co. of California*, 814 F2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

“The identical invention must be shown in as complete detail as is contained in the ----claim.” *Richardson v. Suzuki Motor Co.*, 868 F2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

“The elements must be arranged as required by the claim, but ---- identity of terminology is not required.” *In re Bond*, 910 F2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

2. The Description Designated as “PriorArt” is Not Connected By Park to His Invention

In the Office Action, the Examiner has relied upon a sequence of “Prior Art” Figures (Figs. 1 – 3) and text, along with other figures and text describing Park’s claimed invention as the basis for finding claim 1 to be unpatentable over Park under § 102 (e).

In that context, it must be noted that Figures 1 – 3B of Park (including all of the figures relied on by the Examiner) are presented by Park under the heading “Description of the Prior Art” (col. 1, line 19 – col. 2, line 30).

By definition, such “prior art” **must** be different from “the invention” described in the remainder of the Park patent and it clearly is not Park’s invention. Park himself does not describe how one might attempt to combine portions of Figs. 1 – 3B of Park with other information (e.g. “Abstract”) or other figures of Park which are relied on by the Examiner. It is noted that the Examiner has acknowledged that Park’s invention by itself does not anticipate the present invention.

It is respectfully submitted that there is no actual or inherent disclosure in Park which anticipates Applicant’s claimed invention. In order to assist in emphasizing the aspects of multiple datastreams of particular interleaved data as recited in Applicant’s claims, the language of independent claims 1, 7 and 13 has been rearranged. In particular, language which appeared previously in claim 3 relating to interleaved first, second, third and fourth pixel block components has been inserted into independent apparatus claim 1. Furthermore, first and second datastreams constituted, respectively, by “a first predetermined sequence of interleaved first and second pixel block components” and “a second predetermined sequence of interleaved third and fourth pixel block components” are recited in amended claim 1 but are nowhere suggested or disclosed in Park.

Claim 3 has been amended to point out that the pairs of interleaved pixel block components in the two datastreams are “spatially adjacent”

components.

In independent method claim 7, it is pointed out that the recited multiple datastreams, each having a different predetermined sequence of mutually interleaved pixel block components, are suitable for both high resolution and reduced data image reproduction modes. Nothing of this nature is disclosed or suggested by Park.

Independent method claim 13 has been rearranged in a manner similar to claim 1 so as to describe the first and second data streams each as comprising different interleaved groups in different predetermined sequences. Here again, such a combination is neither suggested nor disclosed by Park.

The Examiner places principal reliance upon Park's "prior art" figs. 3a and 3b, specifically "the combination" of demultiplexer 13 and multiplexer 61 which the Examiner states "serves the same as the interleaving network as claimed."

However, Park states that the prior art figures 3a and 3b relate to the encoder section 10 and the decoder section 60 of fig. 1 "applied with the parallel processing method using such picture division" (as shown in fig. 2). Fig. 2 is described as "one frame image is divided into n subpictures P1 through Pn and image data on respective subpictures are parallel-signal processed by n encoders (or decoders) operated individually". (col. 1, lines 47 – 52).

These combinations of elements in Park are for entirely different purposes and are entirely different arrangements as compared to what is presently claimed. It is respectfully submitted that there is simply no "interleaving means for deriving first and second datastreams" wherein "said first datastream being constituted by a first predetermined sequence of interleaved first and second pixel block components" and "said second datastream being constituted by a second predetermined sequence, etc.," (claim 1) are disclosed. Claim 13 has similar language which is not disclosed by Park. Similarly, there is no mention anywhere in Park of any configuration suitable for either of high resolution or reduced image resolution reproduction (claim 7).

In the Final Rejection, the Examiner refers for the first time to fig. 4,

switch 87 and adder 80 for elements which "process the data base on an interleaved fashion". Park states that adder 90 sums the image data of transform coding section 70 and motion compensating section 80 (col. 3, line 22). There is simply no relationship between what is presently claimed and those cited elements of Park.

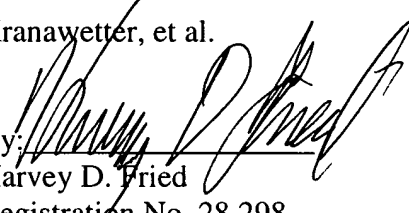
The rejected dependent claims are submitted to be patentable because each includes limitations which are recited in independent claims 1, 7 and 13 which have been shown to be patentable over Park.

Reconsideration and withdrawal of all rejections are respectfully requested in view of the amendments to the claims and the arguments presented above.

CONCLUSION

The identical invention is not shown in Park in as complete detail as is contained in any of Applicant's claims (see Richardson v. Suzuki Motor Co. , supra) and, furthermore, the elements arranged as required by the claims are not disclosed in Park (see In re Bond, supra). In view of the foregoing, reconsideration and withdrawal of all of the rejections and allowance of all pending claims 1 -15 are respectfully requested.

Respectfully submitted,
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CERTIFICATE OF MAILING

I hereby certify that this amendment is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to the Assistant Commissioner for Patents Washington, D.C. 20231 on:

February 12, 2003
Date


Linda Tindall

Amended Claims Showing Changes

1. (Twice amended) An MPEG compatible digital signal processing system comprising:

- an input network for receiving a data stream of MPEG coded data;
- [an interleaving] a coupling network responsive to said datastream for deriving therefrom [multiple datastreams each constituted by] a predetermined sequence of [interleaved] image data; and
- an image signal processor responsive to said [multiple datastreams] image data wherein
said coupling network comprises interleaving means responsive to said datastream of MPEG coded data for deriving therefrom at least first and second datastreams, said first datastream being constituted by a first predetermined sequence of interleaved first and second pixel block components and said second datastream being constituted by a second predetermined sequence of interleaved third and fourth pixel block components for producing decoded image information

3. (Twice Amended) A system according to claim 1, wherein:

- said interleaving [network] means produces a first datastream of interleaved first and second spatially adjacent pixel block components and a second datastream of interleaved third and fourth spatially adjacent pixel block components.

7. (Amended) A method for processing a datastream of MPEG coded image representative data, comprising the steps of:

- decoding said data to produce a decoded datastream;
- producing from said decoded datastream [multiple datastreams with] a predetermined sequence of [mutually] interleaved data blocks representing image pixels;

processing said interleaved data blocks [on an interleaved basis];
and
storing data blocks from said processing step; wherein
said producing step comprises producing multiple datastreams,
each datastream having a different predetermined sequence of mutually
interleaved pixel block components suitable for either high resolution or reduced
data image reproduction modes.

13. (Amended) A method for processing a datastream of MPEG coded image representative data, comprising the steps of:
receiving an input datastream of MPEG coded data;
decoding said input datastream to produce a decoded datastream of data blocks containing pixel representative information;
processing said decoded datastream of data blocks to produce therefrom a first datastream comprising at least first and second groups of data block components having pixel representative information interleaved in a first predetermined sequence, and a second datastream comprising at least third and fourth groups of data block components having pixel representative information interleaved in a second predetermined sequence; and
decoding [to] said first and second datastreams to produce decoded image information.